

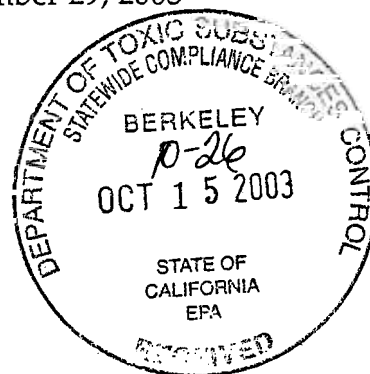


Lawrence Livermore National Laboratory

Environmental Protection Department

September 29, 2003

Ms. Luz Castillo, Senior Hazardous Substances Scientist
Statewide Compliance Division
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2737



**Subject: Management of Samples at LLNL's Onsite Laboratory
Chemistry and Materials Sciences Environmental Services (CES)
Lawrence Livermore National Laboratory (LLNL)**

Dear Ms. Castillo:

This letter is being submitted to further clarify the process which LLNL's onsite laboratory Chemistry and Materials Science Environmental Services (CES) uses to process multiple soil samples. As mentioned in a previous letter sent to you in July 2003, CES uses a portion of each sample for analyses and the remaining sample (referred to as a "soil sample dumping") is archived at CES for an indefinite timeframe until the requested analysis is complete. You include in your letter (dated August 7, 2003) that "the samples become waste once analyses are complete on each individual sample and there is no further need to store the sample pursuant to the exclusion in (22CCR 66261.4(d))". You agree that during the time the soil sample dumpings are archived they are considered samples, but you consider the soil sample dumpings to become waste at the time analyses are complete for each soil sample. The following paragraphs describe why LLNL does not consider the soil sample dumpings to be wastes immediately after the soils analyses are completed.

The following statements are included in CES's Standard Operating Procedure (SOP) that specifies how excess samples (i.e., soil sample dumpings) must be managed:

"Excess samples shall be dumped only after all analyses are complete. In addition, samples shall not be dumped until greater than 60 days after receipt. Note: Unused sample portions are not considered waste until they have been bulked for disposal".

At the time the archived soil sample dumpings are composited into one container, CES places all other soil sample dumpings with similar matrices that have also been archived for up to sixty days in the same container. Since CES processes such a high number of samples (approximately an average of 1,700 samples per month), CES archives enough soil sample dumpings that have reached the sixty-day timeframe, to fill a 55-gallon drum.

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Therefore, any drum that is used to composite the soil sample dumpings that have been archived is completely filled every two months.

Due to the requirement to archive soil sample dumpings for a minimum of sixty days after analyses are complete, CES has a reason to further store the soil sample dumpings due to any possible need for re-analyses. Because the soil sample dumpings have the potential to be used again, CES must manage the soil sample dumpings as samples during the sixty days that they are archived. The soil sample dumpings do not become wastes until CES has no further use for the archived soil (until the sixty days have expired). Once the archived soil sample dumpings are placed in the 55-gallon drum, the appropriate waste label is placed on the drum, and the waste drum is transferred to a 90-day storage area.

Please contact me at (925) 422-3985 if you have any questions regarding this response.

Sincerely,



Ellen Raber, Department Head
Environmental Protection Department

ER/VS:ks

cc:

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